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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOHN V. FERRIS and JOANN M.
FERRIS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

WYNN RESORTS LIMITED, STEPHEN
A. WYNN, CRAIG SCOTT BILLINGS,
STEPHEN COOTEY, MATTHEW O.
MADDOX, JOHN J. HAGENBUCH,
ROBERT J. MILLER, PATRICIA
MULROY, CLARK T. RANDT JR.,
ALVIN V. SHOEMAKER, KIMMARIE
SINATRA, DANIEL B. WAYSON, JAY
L. JOHNSON, RAY R. IRANI, and J.
EDWARD VIRTUE,

Defendants.

Case No. 2:18-cv-00479-APG-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEFENDANT'S
DEADLINE TO PRODUCE EXPEDITED
DISCOVERY**

(FIRST REQUEST)

1 Pursuant to LR IA 6-1 and LR 26-3, the Parties¹ stipulate to the following extension of
2 Defendant's deadline to produce expedited discovery as set forth in this Court's May 24, 2024
3 Order (Dkt. No. 373).

4 WHEREAS Plaintiffs filed a Motion to Compel additional discovery on November 21,
5 2023 (Dkt. No. 327);

6 WHEREAS Defendants filed a Motion for Protective Order on December 5, 2023 (Dkt.
7 Nos. 329-34);

8 WHEREAS Defendants filed a Motion for Partial Summary Judgment on the Alleged
9 February 12, 2018 Corrective Disclosures on November 14, 2023 (Dkt. Nos. 314-26);

10 WHEREAS a hearing was held before the Court on February 12, 2024 regarding
11 Plaintiffs' Motion to Compel and Defendants' Motion for Protective Order, and a hearing was set
12 for rulings on the motions (Dkt. No. 365);

13 WHEREAS Plaintiffs moved for an extension of the fact discovery deadline from May 31,
14 2024 until August 29, 2024 (Dkt. No. 362), and by Order dated March 36, 2024, the Court granted
15 the Motion (Dkt. No. 363);

16 WHEREAS a hearing was held before the Court on May 24, 2024, and the Court granted
17 in part and denied in part Plaintiffs' Motion to Compel additional discovery, and granted in part
18 and denied in part Defendants' Motion for Protective Order (Dkt. No. 373);

19 WHEREAS during the May 24, 2024 hearing the Court ordered Defendants to review and
20 produce additional discovery relevant to the Company Defendants' Motion for Summary
21 Judgment to the extent further responsive materials exist by June 24, 2024 (the "Expedited
22 Review");

23
24
25

¹ The Parties that remain in this action are: (1) Lead Plaintiffs John V. and JoAnn M. Ferris ("Lead
26 Plaintiffs"), (2) additional named plaintiff Jeffrey Larsen ("Additional Plaintiff", and together
27 with Lead Plaintiffs, "Plaintiffs"); and (3) Defendants Wynn Resorts Limited ("Wynn Resorts"
28 or the "Company"), Stephen A. Wynn ("Wynn"), Stephen Cootey, Matthew O. Maddox, and
Kimmarie Sinatra (collectively, "Defendants").

1 WHEREAS Defendants requested that Plaintiffs agree to 30-day extension of the
2 Expedited Review deadline to continue discussions concerning search terms;

3 WHEREAS Plaintiffs responded that they would not object to a 30-day extension of the
4 Expedited Review deadline provided that Defendants give them a response to their June 4, 2024
5 search proposal (with hit counts) by Friday, June 21, 2024, and to the extent that they do not agree
6 with Plaintiffs' June 4 proposal, provide a counterproposal with hit counts by Friday June 21,
7 2024;

8 WHEREAS Defendants agreed that they would provide Plaintiffs with this information
9 by June 21, 2024;

10 WHEREAS the Parties are in continuing discussions concerning a search term plan;

11 THEREFORE, the Parties stipulate and agree, and respectfully request the Court to order
12 as follows:

- 13 1. Defendant's deadline to produce documents in connection with the Expedited
14 Review is extended 30 days, until July 24, 2024.

15 DATED: June 20, 2024

KIRKLAND & ELLIS LLP

17 /s/ Mark S. Holscher

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*Attorneys for Defendants Wynn Resorts, Ltd.,
and Matthew O. Maddox*

DATED: June 20, 2024

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Counsel for Defendant Stephen A. Wynn

1 DATED: June 20, 2024

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Counsel for Defendant Stephen Cootey

8 DATED: June 20, 2024

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Counsel for Defendant Kimmarie Sinatra

20 DATED: June 20, 2024

/s/ Murielle J. Steven Walsh

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Lead Counsel for Class Representatives

DATED: June 20, 2024

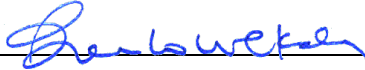
/s/ Daniel Tyre-Karp

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Additional Counsel for Class Representatives

IT IS SO ORDERED:

Dated June 21, 2024
Las Vegas, Nevada


THE HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

On June 20, 2024, I served the foregoing document on all parties appearing in this case when filing said document through the Court's PACER system with automatic e-service on all persons who have registered for e-service on PACER for this case.

/s/ Laura Bay

An employee of KIRKLAND & ELLIS LLP